

SUMMARY

Prepared by Nicholle Jackson
On Wednesday, July 20, 2005



Volatile Organic Compounds from Processes and Consumer Products Workgroup Meeting

Held July 12, 2005

**Somerset County Office of Emergency Management Training Building, Hillsborough
Township, Somerset County**

**Meeting called by: Bob Heil, Group Leader
Co-Facilitators: Tonalee Key, Nicholle Jackson**

Attendees:

Name	Affiliation
Ed Biedell	Terranext
Pat Brown	Chevron
Michael DiGiore	NJDEP
Michelle Donohue	Graphic Arts Association
Dan Forestiere	Sherwin-Williams
Cara Fox	Dupont Chambers Works
Toby Hanna	ERM
Asha Matieda	P.V.S.C.
Eileen Moyer	Reckitt Benckiser
Hiram Oser	NJDEP
Ron Ragucci	EnviroTrades
Tim Roessler	IMTT – Bayonne
Mark Roskein	Somerset County Department of Health
Tony Russo	CCNJ/NJPC
Gwen Schell	Griffin Pipe Products Co.
Robert E. Smyth	TES Technologies/ Smyth, Inc.
Christine Visnic	Merck & Co., Inc.
Josh Worth	Wawa, Inc.
Rosemary T. Zaleski	ExxonMobil Biomedical Sci.

Materials: [Agenda, Minutes from June 29, 2005 VOC workgroup meeting, Workgroup Ground Rules, 2002 New Jersey Point Source VOC Emission Inventory Top 15, 2002 New Jersey Area Source VOC Emission Inventory Top 15, 2002 Periodic Emissions Inventory Area Source VOC Emissions Summer and Annual Statewide, Sample Area Source Calculation Sheets, Proposed VOC Tracking Form, Feedback Form]

Call to Order [15 Minutes]

Attendees Sign In

Review of minutes from the 6/28/05 Workgroup Meeting

Review of Ground Rules

Discussion [5.5 Hours]

Topic 1: Inventory Improvements

Discussion:

- Sample inventory calculation sheets were distributed for the two graphic arts, consumer products, and Gasoline Handling & Marketing, Tank Truck Unloading Loss (Balanced Submerged Filling Or Stage I)
- The 2002 area source VOC emission inventory was reviewed and discussed including the following:
 - Consumer products, including a consumer product survey done by CARB
- The 2002 point source VOC emission inventory was reviewed and discussed including the following:
 - There is concern amongst the workgroup that it will be difficult to get more emission reductions out of point sources
 - The workgroup expressed concern about a specific number for reductions. They would like to know a specific goal for VOC reductions
 - The frequency of inventory release was discussed. NJDEP stated that the inventory is calculated every three years.
- **Sub 8 permits**
 - There are approximately 50,000 Sub 8 permits issued by NJDEP vs. 300 Title V permits
 - Workgroup members are concerned that Title V permit holders are taxed but not Sub 8 permit holders

Conclusion: The workgroup would like to know a more specific goal for emission reductions

Action Items/Person(s) responsible/Deadline:

1. NJDEP will post the full document containing the 2002 Periodic Emission Inventory Area Source Calculation Methodology Sheets on the VOC workgroup webpage prior to the next workgroup meeting
2. Upon review of 2002 consumer product inventory information, Eileen Moyer, Reckitt Benckiser will provide data to CSPA for review
3. NJDEP will supply information on the baseline that was used in the 2002 emission inventory for AIM coatings
4. NJDEP will consult with management to try to provide a more specific goal for VOC emission reductions prior to the next workgroup meeting
5. NJDEP will look into possibilities of calculating emissions from Sub 8 permits

Topic 2: Consumer Products and Area Sources

Discussion:

- Consumer Products and AIM regulations were discussed
- Degreasing - One participant suggested that the NJDEP inventory numbers for degreasing are too low and that degreasing should be more heavily regulated. The use of exempt, less reactive solvents for degreasing was also discussed.
- Gasoline Dispensing Facilities and the use of Portable Fuel Containers were discussed
- It was suggested that an enforcement alert/compliance advisory be issued to enforce NJAC 7:27-16.6 (Open top tanks and solvent cleaning operations)

Each item was noted and the proposals and continued discussion are located on the attached pages of VOC Tracking Proposal.

Conclusion: No conclusions at this time

Action Items/Person(s) responsible/Deadline:

1. Eileen Moyer, Reckitt Benckiser, will contact Doug Fratz of the Consumer Specialty Products Association (CSPA) about giving a presentation at a future workgroup meeting
2. Ron Ragucci, Envirotrades, will provide NJDEP with information on degreasing operations (reference numbers)

Topic 3: Industrial Sources Regulated by NJAC 7:27-16**Discussion:**

- The workgroup discussed each subsection of NJAC 7:27-16
- The following concerns were raised by the workgroup:
 - There is concern amongst the workgroup that there is no “low-hanging fruit” left and that there are already too many MACT and RACT regulations in place
 - There is concern amongst the workgroup about how facilities are given credit for the various MACT reductions. NJDEP will follow-up on this issue.
- The following operations were discussed:
 - **Marine Ballasting**
 - There is a possibility that by 2010, single-hulled vessels will no longer be permitted in US waters. Single hulled ships are being phased out gradually. The phase-out may affect the inventory numbers.
 - **Retail Gas Stations**
 - Vapor recovery systems – WAWA, Inc. has tried some new technologies that are not currently required by NJDEP
 - “Stop at the click” initiatives at gas stations – initiatives are underway in TX, CA, PA, DE, and other states
 - Gas pumps and hoses are not always well maintained which makes the vapor recovery system inefficient. Enforcement action may need to be taken.
 - Fleet gas refilling
 - Calibration testing methodology used/required by Weights and Measures – currently no vapor recovery system is used
 - **Graphic Arts Industry**
 - A concern was raised that graphic arts operations should be differentiated from surface coating operations
 - **Leak Detection and Repair (LDAR)**
 - Workgroup members suggested a more consolidated LDAR rule to make it easier for both the facility and enforcement

Each item was noted and the proposals and continued discussion are located on the attached pages of VOC Tracking Proposal.

Conclusion: No conclusions at this time

Action Items/Person(s) responsible/Deadline:

1. Tim Roessler, IMTT Bayonne, will provide information regarding the concern about open hatches on barges (i.e. what type of cargo? Liquids or solids? Type of liquids? Possible control measures? Enforcement actions?)
 2. Josh Worth, Wawa, Inc., will provide literature and CARB Executive Order regarding retail gas station technology (membranes)
 3. NJDEP will provide more information about initiatives in other states to stop topping off gas tanks
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4. NJDEP will look into retail gas station pump calibration testing methodology used/required by Weights and Measures
 5. Michelle Donohue, Graphic Arts Association, will provide literature about the printing process and more accurate emissions numbers for graphic arts operations
 6. NJDEP will look into providing additional graphic arts inventory information (if available)
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Topic 4: Reactivity-Based Regulations

Discussion:

- Rosemary Zaleski gave a brief presentation on Successfully Creating a Reactivity-Based Program for Control of VOCs in Consumer Products and Coatings on behalf of the American Solvents Council of the American Chemistry Council.
- Participants commented that reactivity-based regulations will not work for all products and that sometimes products can become more reactive if product formulations are changed.

Conclusion: No conclusions at this time

Action Items/Person(s) responsible/Deadline: None at this time

Wrap-up [10 minutes]

- Assignments for the next meeting were discussed (they are included in the action items sections above)
 - A feedback survey was distributed to the workgroup. The results of the survey will determine whether or not the group breaks into subgroups, agenda for the next workgroup meeting, and the logistics for the next meeting
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